

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

In re Application of FORENSIC NEWS LLC and  
SCOTT STEDMAN for an Order Pursuant to 28  
U.S.C. § 1782 to Conduct Discovery for Use in a  
Foreign Proceeding.

Case No. \_\_\_\_\_

**[PROPOSED] ORDER**

Upon consideration of the application submitted by Forensic News LLC and Scott Stedman (“Petitioners”) for an order pursuant to 28 U.S.C. § 1782 to conduct discovery for use in a foreign proceeding, and the accompanying memorandum of law, Declarations of Anne Champion and Patrick Doris, and supporting documents,

IT IS HEREBY ORDERED that:

1. The application for discovery from Respondent Richard Frankel pursuant to 28 U.S.C. § 1782 is granted;
2. The Petitioners are authorized to take discovery relating to the issues identified in their application from Respondent Frankel in accordance with the Federal Rules of Civil Procedure and the Rules of this Court, including by serving on Respondent Frankel a subpoena duces tecum for a deposition and the production of documents listed in the form of the subpoenas attached as Exhibit 1 to the Declaration of Anne Champion;
3. Respondent Frankel is hereby directed to comply with the subpoenas in accordance with the Federal Rules of Civil Procedure and the Rules of this Court;
4. Anne Champion of Gibson, Dunn & Crutcher LLP is hereby appointed to issue, sign, and serve the subpoenas upon Respondent Frankel; and

5. This Court shall retain such jurisdiction as is necessary to effectuate the terms of such subpoenas.

Dated: \_\_\_\_\_, 2022

SO ORDERED

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U.S.D.J.